

P35 3393929

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO	
Triangle PWC Inc	
STREET AND NO	
1701 Wheeling Ave.	
P.O., STATE AND ZIP CODE	
Glendale WA	
POSTAGE	\$
CERTIFIED FEE	c
SPECIAL DELIVERY	c
RESTRICTED DELIVERY	c
OPTIONAL SERVICES	
RETURN RECEIPT SERVICE	
SHOW TO WHOM AND DATE DELIVERED	c
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	c
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	c
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	c
TOTAL POSTAGE AND FEES	\$
POSTMARK OR DATE	

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● **SENDER:** Complete items 1-2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☒ Show to whom and date delivered c
☐ Show to whom, date, and address of delivery.. c

2. ☐ **RESTRICTED DELIVERY** c
 (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. **ARTICLE ADDRESSED TO:**
 MR. C. R. DeGroot
 TRIANGLE PWC
 1701 Wheeling Ave.
 Glendale WA 98038

4. **TYPE OF SERVICE:** **ARTICLE NUMBER**
☐ REGISTERED ☐ INSURED
☐ CERTIFIED ☐ COD
☐ EXPRESS MAIL
 P35 339 3929

(Always obtain signature of addressee or agent)
 I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
 Carl E. Groot

5. **DATE OF DELIVERY**
 3-22-82

6. **ADDRESSEE'S ADDRESS** (Only if requested)

7. **UNABLE TO DELIVER BECAUSE:**

7a. **EMPLOYEE'S INITIALS**
 M

POSTMARK
 MAR 22 1982
 USPO



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

Certified Mail
Return Receipt Requested

MAR 18 1982

Mr. C. R. DeGroote
Triangle PWC, Inc.
1701 Wheeling Avenue
Glendale, WV 26038

Re: EPA Identification No. WWD 00 431 4928
Facility Name: Triangle PWC, Inc.
1701 Wheeling Avenue
Glendale, WV 26038

Dear Mr. DeGroote:

This letter constitutes a formal request for Part B of your application for a hazardous waste management facility permit under the Resource Conservation and Recovery Act for the facility referenced above. This request is made under the authority of regulation 40 CFR § 122.22(a).

Enclosed for your reference is a list of the items which constitute Part B as applicable to your facility type. These items must be submitted by September 20, 1982. If any of this information is being submitted under a claim of confidentiality, please indicate this fact. (For more information on confidentiality, see regulation 40 CFR Part 2.)

Should you have any questions about these requirements, please contact Ms. Shirley Bulkin on 215/597-4269 or the address shown above. She is in the process of scheduling pre-application briefing meetings to assist applicants in their permit submittal. In order to accommodate and assist you, we need to know of your intent to submit Part B of your permit application within 30 days of your receipt of this letter.

Sincerely yours,

Stephen R. Wassersug
Stephen R. Wassersug

for Director, Air & Waste Management Division

Enclosure: List of Part B Requirements
Part 264 Standards

Please review the enclosed copies of the revised interim final regulations and minor corrections. Failure to comply with these requirements subjects you to possible enforcement action. If you have any questions or need assistance, please feel free to contact Mr. William Schremp of the State Waste Management Section at (215) 597-0982.

Sincerely yours,



Stephen R. Wassersug, Director
for Air and Waste Management Division

Enclosures

Triangle PWC, Inc.

New Brunswick, New Jersey 08903

April 24, 1981

Shirley D. Bulkin
Chief, RCRA Administrative Support Section
Permit Enforcement Branch
Enforcement Division
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
Sixth and Walnut Streets
Philadelphia, Pennsylvania 19106

RE: Hazardous Waste Permit Application--Incomplete Application
EPA I.D. Number: WVD 00 431 4928
Facility Name: Triangle PWC, Inc.
Facility Location: 1701 Wheeling Avenue
Glen Dale, WV 26038

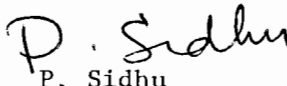
Dear Ms. Bulkin:

With respect to your latest letter dated April 13, 1981 on this subject, we are herewith submitting the requisit information as outlined in EPA form 3510-3.

IV. Facility Contact: Phone number and name is correct
VIII.B. Is the name listed: Yes
In VIII. A. also the owner
XIII. Certification
A. 1. Name: Provided
2. Official Titles: Provided

I trust the above information will complete all the requirements and we look forward to a speedy approval.

Sincerely,


P. Sidhu

Dir. of Facilities & Process Engrg.

/do

cc: C. McClarin

A SUBSIDIARY OF TRIANGLE INDUSTRIES, INC.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

EPA I.D. # WVD 00 431 4928

January 9, 1981

Triangle PWC Inc.
Mr. Charles McClarin
1701 Wheeling Avenue
Glendale, WV 26038

Re: Acknowledgment of Application for
a Hazardous Waste Permit

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

PS Form 3811, Dec. 1980

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● **SENDER:** Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☒ Show to whom and date delivered —¢
☐ Show to whom, date, and address of delivery.. —¢

2. ☐ **RESTRICTED DELIVERY** —¢
 (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. **ARTICLE ADDRESSED TO:**
 Kenan Transport Company
 P.O. Box 13685
 Roanoke, VA 24036

4. **TYPE OF SERVICE:** **ARTICLE NUMBER**
☐ REGISTERED ☐ INSURED
☐ CERTIFIED ☐ COD
☐ EXPRESS MAIL
 P311 555 464

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent
Mike Shatto

5. **DATE OF DELIVERY**
 12/15/80

6. **ADDRESSEE'S ADDRESS** (Only if requested)

7. **UNABLE TO DELIVER BECAUSE:** 7a. **EMPLOYEE'S INITIALS**
 [Signature]

P 311 559 464 RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

SENT TO
Thompson PWC Inc.
 STREET AND NO.
1701 Wheeling Ave
 P.O., STATE AND ZIP CODE
Glendale WV 26038

POSTAGE \$

CONSULT POSTMASTER FOR FEES	OPTIONAL SERVICES	CERTIFIED FEE	¢
		SPECIAL DELIVERY	¢
		RESTRICTED DELIVERY	¢
	RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE			

PS Form 3800, Apr. 1976

Triangle PWC, Inc.

New Brunswick, New Jersey 08903

July 6, 1982

Ms. Shirley Bulkin (3AW32)
U.S. Environmental Protection Agency
Region III, Curtis Building
Sixth and Walnut Streets
Philadelphia, PA 19106

Ref.: Triangle PWC, Inc.; Glen Dale, West Virginia
WVD 00 431 4928

Dear Ms. Bulkin:

With respect to your letter of 6/1/82 from Mr. Stephen R. Wassersug regarding the closure and post-closure assurance and liability insurance, we wish to advise you that for the past several months the spent acid from our pickling process has been sent to Ormet Corporation at Hannibal, Ohio, on a weekly basis, where it is used as a raw material.

We fall under the category of, "only generators who store hazardous waste on site in tanks or containers for less than 90 days are exempt from these requirements". Therefore, the closure and post-closure assurance and the liability insurance does not apply to us.

Thanking you for your cooperation,

Yours truly,

TRIANGLE PWC, INC.



Parmpal S. Sidhu
Director of Facilities and
Process Engineering

PSS:crc

cc: A. Dunbar
N. Hooley
C. McClarin
C. McPhail

A SUBSIDIARY OF TRIANGLE INDUSTRIES, INC.

WFO-00-4 31-4928

June 25

Triangle PWC, Inc.

Address OCCUPANT

POSTAGE AND FEES PAID
EPA-335
U.S. ENVIRONMENTAL PROTECTION AGENCY

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III
8TH & WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106
OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300
AN EQUAL OPPORTUNITY EMPLOYER

A REMINDER...

As result of Financial Requirements and Liability Insurance Regulations EPA anticipates the following:

by July 6, 1982

cost estimates for closure and post-closure accompanied by financial assurances

by July 15, 1982

proof of liability coverage for third party sudden accidental occurrences demonstrated by a financial test &/or policy endorsement

RCRA Financial And Liability Insurance Requirements

On April 7 and April 16, 1982 EPA promulgated Financial and Liability Requirements under the Resource Conservation and Recovery Act (RCRA). These requirements are codified in 40 CFR part 264 Subpart H and part 265 Subpart H. The purpose of these regulations is to assure that adequate funding is available for closure and post-closure costs for hazardous waste facilities and to require liability coverage for accidental occurrences. All hazardous waste treatment storage, or disposal facilities (TSDs) will be expected to comply with these regulations.

Existing facilities governed by Interim Status that are located in states that have not received Phase I Authorization must comply with Part 265, Subpart H of the regulations by the dates indicated below. In Region III, these are West Virginia and the District of Columbia.

Facilities that are in operation now in states that have received Interim Authorization for Phase I of the Federal Hazardous Waste Management System must follow the requirements provided in Part 264, Subpart H of the regulations at the time they receive an EPA permit. In Region III, these states are Pennsylvania, Maryland, Virginia, and Delaware. New facilities, those not yet in operation, will meet Part 264 Subpart H prior to receiving EPA permits.

RCRA Financial Requirement Regulations

Part 265 Subpart H requires existing facilities in West Virginia and the District of Columbia to submit cost estimates for closure and post-closure activities along with documentation detailing the financial instruments to EPA by July 6, 1982. Part 264 Subpart H requires new and existing TSD facilities with EPA permits to have in effect financial mechanisms to cover closure and post-closure costs.

RCRA Liability Insurance Requirement Regulations

TSD owners or operators must have liability coverage for sudden accidental occurrences. Owners and operators of land disposal facilities must have sudden and nonsudden accidental occurrences coverage.

Requirements for Sudden Accidental Occurrences Coverage

- 1) \$1 million per occurrence; \$2 million annual aggregate
- 2) Proof of liability coverage through financial test or insurance or any combination thereof
- 3) Revised financial statements submitted to EPA Region III review annually
- 4) Coverage to continue until certification of closure received by Region III Regional Administrator

Requirements for Nonsudden Accidental Occurrences Coverage

- 1) \$3 million per occurrence; \$6 million annual aggregate (excluding legal defense costs)
- 2) Proof of liability coverage through financial test or insurance or any combination thereof
- 3) Revised financial statements submitted to EPA Region III review annually
- 4) Coverage to continue until certification of closure received by Region III Regional Administrator

New facilities must submit proof of insurance coverage to EPA 60 days before first receipt of waste.

Note: State and federal facilities and those storing hazardous waste for less than 90 days are exempt from these requirements. Additional state regulations may apply in some areas.

Deadlines for Compliance Under Part 265 Subpart H

All TSDs in West Virginia and the District of Columbia must have coverage for sudden accidental occurrences in effect by July 15, 1982. Facilities that must provide nonsudden accidental occurrences coverage must have it in effect according to the following schedule:

January 16, 1983 - TSDs with annual sale/revenues of \$10 million or more

January 16, 1984 - TSDs with annual sale/revenues between \$5 million and \$10 million or more

January 16, 1985 - All other TSDs

Documentation

Documents showing cost estimates for closure and post-closure activities and the appropriate financial instruments must be submitted by July 6, 1982.

Documents showing proof of liability coverage for sudden accidental occurrences must be submitted no later than July 15, 1982.

Proof of coverage may be shown through one or a combination of the following: *

- a certificate of insurance
- a liability endorsement
- a letter from the firm's chief financial officer; a special report and a report of examination from an independent certified public accountant.

Wording of the documents must be as specified in the regulations. EPA Identification Number should be all correspondence.

Send these documents to :

Ms. Shirley Bulkin (3AW32)
EPA, Region III
6th & Walnut Streets
Philadelphia, PA 19106

Questions?

For more information contact William Schremp of the Region III office at (215) 597-0982.

* This brochure is intended to be used only as a guide. Please consult the regulations for a comprehensive explanation before submitting any documents to EPA.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

JUN 1 1982

WVD 00 431 4928

Mr. Charles R. DeGroote
Triangle PWC, Inc.
1707 Wheeling Avenue
Glendale, WV 26038

Dear Mr. DeGroote:

This letter is to make you aware of two recent amendments to the RCRA regulations. On April 7, 1982, the Environmental Protection Agency (EPA) published requirements for owners and operators of hazardous waste management facilities to demonstrate financial responsibility for the costs of closure and post-closure care. EPA published third party liability coverage requirements for owners or operators of hazardous waste management facilities on April 16, 1982.

Closure and Post-Closure Assurance

As an owner or operator of a hazardous waste treatment, storage, or disposal facility, you are required to submit information that demonstrates that you are financially capable of bearing the costs of closing your facility. In addition, if you own or operate a disposal facility, you also must submit information that demonstrates that you are capable of covering the costs of post-closure care of your facility.

The appropriate documentation, as specified in the enclosed regulations, must be submitted to this EPA Regional Office by July 6, 1982. You must submit one or a combination of the following documents, with wording of the documents identical to the wording specified in the regulations:

- ° a trust agreement;
- ° a surety bond;
- ° a letter of credit, including a trust agreement;
- ° a certificate of insurance;
- ° a letter from your firm's chief financial officer;
and a special report and a report of examination from an
independent certified public accountant; or
- ° a corporate guarantee.

Liability Insurance

As an owner or operator of a hazardous waste treatment, storage, or disposal facility, you must demonstrate that you have liability insurance for sudden accidental occurrences at your facility. In addition, if you own or operate a landfill, surface impoundment, or land treatment facility, you must also demonstrate that you have liability insurance for nonsudden accidental occurrences at your facility.

You may use either an insurance policy or a financial test to demonstrate third party liability coverage. You must submit to this office by July 15, 1982, the appropriate documentation for liability coverage for sudden accidents, as specified in the enclosed regulations. You must submit the appropriate documentation for liability coverage for nonsudden accidents, as specified in the enclosed regulations, according to the following phase-in schedule: by January 16, 1983, if you have annual sales or revenues of \$10 million or more; by January 16, 1984, if you have sales or revenues between \$5 and \$10 million; or by January 16, 1985 if your annual sales or revenues are less than \$5 million. If you fall into one of the last two groups, you must submit notification of when you will have liability coverage for nonsudden accidents by January 16, 1983. You must submit one or a combination of the following documents, with wording of the documents identical to the wording specified in the regulations:

- ° a certificate of insurance;
- ° a liability endorsement; or
- ° a letter from your firm's chief financial officer, and a special report and a report of examination from an independent certified public accountant.

The financial documents must be sent to:

Ms. Shirley Bulkin (3AW32)
U. S. Environmental Protection Agency
Region III, Curtis Building
Sixth and Walnut Streets
Philadelphia, PA 19106

Please be sure to include your EPA Identification Number on all correspondence.

Only generators who store hazardous waste on site in tanks or containers for less than 90 days are exempt from these requirements. Also, State and Federal facilities are exempt from these requirements. Your State, however, may have additional requirements in these areas.